

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

CRIMINAL NO.: 04-10336

UNITED STATES OF AMERICA

v.

SANTIAGO ET AL.

**DEFENDANT JOSE TORRADO'S MOTION FOR PRE-PLEA PRESENTENCE
REPORT**

The defendant, JOSE TORRADO, by his attorney respectfully requests that this Honorable Court enter an order directing the United States Probation Office to prepare a Pre-Plea Presentence Report. The report will assist the parties to determine whether they have an agreement on significant sentencing factors and may save judicial resources as a result. The government has been notified of this motion and has expressed no opposition to same, but has requested that a date in the middle of September to file his statement of facts.

Respectfully submitted,
JOSE TORRADO
By his attorney,

/s/ Lenore Glaser
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Dated: August 30, 2005